IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

| AMANDA VALENZUELA, | § | |
|-------------------------|---|----------------------------------|
| Plaintiff, | § | |
| | § | |
| V. | § | CIVIL ACTION NO. 1:19-cv-1202-RP |
| | § | |
| UNIVERSITY OF TEXAS AT | § | |
| AUSTIN and JOHN CLARKE, | § | |
| Defendants. | § | |
| | | |

DEFENDANTS' UNOPPOSED MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

Defendants, The University of Texas at Austin ("UT Austin") and John Clark, Ph.D. ("Dr. Clarke") (collectively "Defendants"), file this Unopposed Motion to Withdraw and Substitute Counsel. In support, Defendants state the following:

- 1. Assistant Attorney General Summer R. Lee is currently listed as counsel for Defendants in the above-captioned cause.
- 2. There is good cause to withdraw Ms. Lee as counsel for Defendants because Ms. Lee is leaving the employment of the Office of the Attorney General of Texas as of the date of this filing. The withdrawal will not delay these proceedings.
- 3. Defendants request that Assistant Attorney General Jeffrey E. Farrell be substituted as counsel for Defendants in this matter.
- 4. Ms. Lee should be removed from all correspondence and notifications in this matter, and Mr. Farrell should be listed as counsel for Defendants and may be contacted through the information provided below:

JEFFREY E. FARRELL Texas Bar No. 00787453 Assistant Attorney General General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 Telephone: (512) 463-2120

Facsimile: (512) 320-0667 jeffrey.farrell@oag.texas.gov

For the foregoing reasons, Defendants respectfully request that the Court grant this motion to withdraw Assistant Attorney General Summer R. Lee as counsel and substitute Assistant Attorney General Jeffrey E. Farrell in the above-captioned cause.

Respectfully submitted,

KEN PAXTON Attorney General of Texas

BRENT WEBSTER First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN COWLES
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT Chief for General Litigation Division

/s/ Jeffrey E. Farrell
SUMMER R. LEE
Texas Bar No. 24046283
Jeffrey E. Farrell
Texas Bar No. 00787453
Assistant Attorneys General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
Telephone: (512) 463-2120

Facsimile: (512) 320-0667

<u>summer.lee@oag.texas.gov</u> jeffrey.farrell@oag.texas.gov

COUNSEL FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned has conferred with Plaintiff and/or her counsel and Plaintiff is not opposed to the requested substitution of counsel.

/s/ Summer R. Lee
Summer R. Lee
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and served a true and correct copy of the foregoing to the following in compliance with the Federal Rules of Civil Procedure.

Amanda Valenzuela 800 Caribou Ridge Trail Pflugerville, Texas 78660

Via email: amanda.n.valenzuela@gmail.com

Keith Altman 33228 West 12 Mile Rd., Suite 375 Farmington Hills, MI 48334

Via email: keithaltman@kaltmanlaw.com

/s/ Jeffrey E. Farrell
Jeffrey E. Farrell
Assistant Attorney General